

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUDGINS, et al.,)	
)	
-v-)	Case No. 1:16-cv-07331
)	
TOTAL QUALITY LOGISTICS, LLC,)	Judge Matthew F. Kennelly
)	
Defendant.)	

AMENDED (PROPOSED) JOINT TRIAL PLAN

Plaintiff Brian Hudgins, on his own behalf and on behalf of those similarly situated, and Defendant Total Quality Logistics, LLC (“TQL”) jointly submit the following Amended (Proposed) Joint Trial Plan:

I. BIFURCATION OF TRIAL

The Parties agree that trial shall be bifurcated on the issues of liability and damages. The Parties have not agreed regarding how a second trial on the issue of damages, to the extent liability is found, shall be conducted. The Parties have previously submitted briefs to the Court regarding their separate proposed plans for how the Court should conduct a second trial on the issue of damages, should it be necessary (Dkt. #219 (Defendant’s Brief), Dkt. #220 (Plaintiffs’ Brief)). The Court has taken these positions under advisement.

II. DEPOSITIONS OF NON-DEPOSED TRIAL WITNESSES

The Parties agree that both sides may each present up to 14 collective-member witnesses, at least half of which for each side must be selected from those collective members whose depositions have already been taken as of July 18, 2019. The Parties also agree that both sides may each present up to 10 non-collective-member witnesses. For any witnesses either side identifies who have not been previously deposed (including collective and non-collective

member witnesses), the other side may take that individual's deposition at any time prior to the Final Pretrial Conference.

III. APPLICABLE DEADLINES

The following deadlines apply only to the first trial on the issue of liability. In the event liability is found, a separate trial plan will be submitted for a second trial on the issue of damages.

A. Trial Dates

A jury trial on the issue of liability will be held on March 30, 2020 – April 10, 2020.

B. Identification and Deposition of Witnesses

Disclosure of Trial Witnesses (Including Experts): November 19, 2019 (Completed)

Deadline to Take Depositions of Identified Trial Witnesses Who Have Not Been Previously Deposed: March 9, 2020

C. Plaintiffs' Motion to Strike TQL's Expert Witness¹

Deadline for Plaintiffs' Motion: October 25, 2019 (Completed)

Deadline for TQL's Response: November 15, 2019 (Completed)

Deadline for Plaintiffs' Reply: December 2, 2019 (Completed)

D. Disclosure of Exhibits and Motions in Limine

Disclosure of Trial Exhibits: February 7, 2020

Deadline for Motions in Limine: February 18, 2020

Deadline for Responses to Motions in Limine: February 28, 2020

E. Final Pretrial Conference

Final Pretrial Order: March 2, 2020

¹ These deadlines apply only to any experts that TQL identifies regarding the trial on liability. In the event that a second trial on damages is necessary, Plaintiffs reserve the right to move to strike any experts that TQL may identify regarding damages.

Final Pretrial Conference:

March 9, 2020 at 2:00pm CST

Dated: January 8, 2020

Respectfully submitted,

/s/ Kimberly De Arcangelis

Kimberly De Arcangelis, Esq.
C. Ryan Morgan, Esq.
MORGAN & MORGAN, P.A.
20 N. Orange Ave., 14th Floor
Orlando, FL 32801
Telephone: (407) 420-1414
Facsimile: (407) 245-3383

Attorneys for Plaintiffs

/s/ Bryce J. Yoder

Bryce J. Yoder (*admitted pro hac vice*)
Gregory M. Utter (*admitted pro hac vice*)
Keating Meuthing & Klekamp, PLL
One E. Fourth Street, Suite 1400
Cincinnati, Ohio 45202
Telephone: (513) 579-6538

Matthew A. Bills
Barack Ferrazzano Kirschbaum & Nagelberg
LLP
200 W. Madison St., Ste. 3900
Chicago, Illinois 60606
Telephone: (312) 629-7493

*Attorneys for Defendant Total Quality
Logistics, LLC*